



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

March 8, 2005

Certified Mail No. 7000 1670 0013 8128 9083

Ed White, Operations Manager
ConAgra Foods Packaged Food Company, Inc.,
dba Lamb Weston
P O Box 128.
Twin Falls, Idaho 83303

RE: Facility ID No. 083-00062, ConAgra Foods Packaged Food Company, Inc., Twin Falls
Final Tier II Operating Permit Letter

Dear Mr. White:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2- 040422 to ConAgra Foods Packaged Food Company, Inc. in Twin Falls, in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application received December 13, 2004. This Tier II operating permit is effective immediately and replaces Tier II Operating Permit No. T2-020425, issued April 1, 2003, the terms and conditions of which shall no longer apply.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Steve VanZandt of the Twin Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 or at wrogers@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/HE/sd

Permit No. T2-040422

Enclosure



**Air Quality
TIER II OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-040422

FACILITY ID No.: 083-00062

AQCR: 63

CLASS: SM80

SIC: 2099

ZONE: 11

UTM COORDINATE (km): 706.6, 4714.0

1. PERMITTEE

ConAgra Foods Packaged Foods Company, Inc.,
dba Lamb Weston, Inc. and ConAgra Foods Specialty Potato Products

2. PROJECT

Tier II Operating Permit Revision

3. MAILING ADDRESS

856 Russett

CITY

Twin Falls

**STATE
ID**

ZIP

83301

4. FACILITY CONTACT

Dave Kubosumi

TITLE

Engineering Manager

TELEPHONE

208-733-5664

5. RESPONSIBLE OFFICIAL

Ed White

TITLE

Operations Manager

TELEPHONE

208-733-5664

6. EXACT PLANT LOCATION

42° 33 min 07 sec N, 114° 29 min 00 sec W, Twin Falls, Idaho

COUNTY

Twin Falls

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Production of frozen potato products

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 et seq. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to DEQ review in accordance with 58.01.01.200 of the *Rules*.


TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: March 8, 2005

DATE EXPIRES: March 19, 2008

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/dscf	grains per dry standard cubic foot
hr/day	hours per day
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatt
lbs	pounds
lb/hr	pound per hour
lb/MMCF	pounds per million cubic feet
lb/1000 gal	pounds per thousand gallons
MMBtu/hr	million British thermal units per hour
MMCF	million cubic feet
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
QA	quality assurance
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/day	tons per day
T/hr	tons per hour
T/yr	tons per year, or tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-040422

Permittee:	ConAgra Foods Packaged Foods Company, Inc., dba Lamb- Weston Inc. and ConAgra Foods Specialty Potato Products	Facility ID No. 083-00062	Date Issued:	March 8, 2005
Location:	Twin Falls, Idaho		Date Expires:	March 19, 2008

1. TIER II OPERATING PERMIT SCOPE**Purpose**

- 1.1 This Tier II operating permit is a revision to the facility's existing permit. This revision is a facility name change due to corporate reorganization. This Tier II operating permit incorporates the requirements of existing permits to demonstrate compliance with the NAAQS and establishes facility-wide emissions below Tier I operating permit thresholds.
- 1.2 This Tier II operating permit replaces the following permits, the terms and conditions of which shall no longer apply:
- Tier II Operating Permit No. T2-020425, issued April 1, 2003.
 - Tier II Operating Permit No. 083-00062, issued May 24, 2002.

*T2-010431***Regulated Sources**

- 1.2 Table 1.1 below lists all regulated emissions sources in this permit.

Table 1.1 Regulated Source Summary

Permit Section	Source Description	Emissions Control(s)
3	Line 1 fryer, line 2 fryer, line 4 fryer, and special products fryer	Scrubber
4	Line 1 dryers, line 2 dryer and pre-dryer, line 4 dryer, and special products dryer	None
5	Boiler No. 1 - Combustion Engineering 16-A-15, 180 MMBtu/hr	None
6	Boiler No. 2 - Murray-Trans MCF4-57, 72 MMBtu/hr; Boiler No. 3 - Cleaver Brooks D-52, 36 MMBtu/hr	None
7	Heaters and burners	None
8	Emergency diesel generators - 100 kW and 230 kW	None
9	Waste gas burner - American Heating Co., AHC-1500, 19 MMBtu/hr	None

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2. FACILITY-WIDE CONDITIONS***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Odors

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.5 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.7 The permittee shall conduct a monthly, facility-wide, visible emissions inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emissions, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action, and report the exceedance in accordance with IDAPA 58.01.01.130-136.

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The permittee shall maintain on site records of the results of each visible emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following information: the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken. These records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

Excess Emissions

- 2.8 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Fuel-Burning Operating Requirements

- 2.9 Nitrogen oxides (NO_x) emissions from the combustion of any combination of fuels shall not exceed 99 tons per any consecutive 12-month period.

Sulfur dioxide (SO₂) emissions from the combustion of any combination of fuels shall not exceed 99 tons per any consecutive 12-month period.

Fuel Consumption Monitoring And Recording

- 2.10 The permittee shall monitor and record the following parameters monthly and annually to demonstrate compliance with Permit Condition 2.9. The records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 2.10.1 The amount of natural gas burned, in cubic feet per month or therms per month, and cubic feet or therms per any consecutive 12-month period
- 2.10.2 The amount of diesel fuel burned, in gallons per month and gallons per any consecutive 12-month period
- 2.10.3 The amount of cooking oil burned, in gallons per month and gallons per any consecutive 12-month period
- 2.10.4 The amount of waste gas burned, in cubic feet per month and cubic feet per any consecutive 12-month period

NO_x And SO₂ Emission Calculations

- 2.11 The permittee shall calculate NO_x and SO₂ emissions using the equations in Tables 2.1 and 2.2 respectively, to demonstrate compliance with Permit Condition 2.9. Records of the emissions calculations and emissions rates shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request. The records shall be submitted to DEQ on or before January 31 and July 31 of each year.

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2.12 The NO_x calculations shall be made using the following table:

Table 2.1 NO_x CALCULATIONS

Source	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler 1 natural gas	MMCF x	83.73 lb/MMCF =	lbs
Rest of plant natural gas	MMCF x	100 lb/MMCF =	lbs
Waste gas	MMCF x	100 lb/MMCF =	lbs
Total diesel	Gallons x	20 lb/1000 gal =	lbs
Total vegetable oil	Gallons x	25 lb/1000 gal =	lbs
Total =			lbs
			tons

2.13 The SO₂ calculations shall be made using the following table:

Table 2.2 SO₂ CALCULATIONS

Source	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler 1 natural gas	MMCF x	0.6 lb/MMCF =	lbs
Rest of plant natural gas	MMCF x	0.6 lb/MMCF =	lbs
Waste gas	MMCF x	1015 lb/MMCF =	lbs
Total diesel	Gallons x	7.1 lb/1000 gal =	lbs
Total vegetable oil	Gallons x	0.11 lb/1000 gal =	lbs
Total =			lbs
			tons

Open Burning

2.14 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

Test Method

2.15 If testing is required, the permittee shall use the test methods listed in Table 2.3 to measure the pollutant emissions.

Table 2.3 EPA Reference Test Methods

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157

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Performance Test Report

- 2.16 In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of test completion.

Reports and Certifications

- 2.17 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
601 Pole Line Rd., Suite 2
Twin Falls, ID 83301

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3. LINE 1 FRYER, LINE 2 FRYER, LINE 4 FRYER AND SPECIAL PRODUCTS FRYER**3.1 Process Description**

Potatoes are fried in one of four fryers. If needed for a special product, a batter is first applied. The fryer exhaust contains PM from the potatoes and from the oil used for frying, and VOC's from the frying process. The fryers exhaust exits through a water scrubber.

Emissions Limits**3.2 Emissions Limits**

Emissions from the line 1 fryer, line 2 fryer, line 4 fryer, and the special products fryer shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**3.3 Throughput Limit**

The maximum throughput of finished potato products from the line 1 fryer, line 2 fryer, line 4 fryer, and the special products fryer shall not exceed the tons-per-day and tons-per-year production limits listed in Table 3.1. To demonstrate compliance with the annual production limit, the monthly production from each fryer shall be summed over the previous 12-month period.

Table 3.1 DAILY AND ANNUAL FRYER PRODUCTION LIMITS

Source Description	Daily Production Limit (T/Day)	Annual Production Limit (T/Any Consecutive 12-Month Period)
Line 1 fryer	590	215,146
Line 2 fryer	544	198,502
Line 4 fryer	770	281,021
Special products fryer	109	39,683

3.4 Monitoring Equipment

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, equipment which continuously measures the pressure differential across the scrubber and the scrubbing media flowrate.

3.5 Operations and Maintenance Manual Requirements

The permittee shall develop an O&M manual for the scrubber which describes the procedures that will be followed to comply with General Provision 11.2 and the scrubber operating requirements contained in this permit. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

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3.6 Pressure Drop Across Scrubber

The pressure drop across the scrubber shall be maintained within the manufacturer and O&M manual specifications. Documentation of the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.7 Scrubbing Media Flowrate

The scrubbing media flowrate to the scrubber shall be maintained within manufacturer and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media flowrate specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring And Recordkeeping Requirements

3.8 PM₁₀ Performance Tests

The permittee shall conduct a performance test to measure PM₁₀ emissions from the line 4 fryer stack on or before December 21, 2004, and at least once every five years thereafter. The permittee shall use the results of the PM₁₀ performance tests to establish a PM₁₀ emission factor which shall be used to estimate emissions from each fryer at the facility and to demonstrate compliance with the PM₁₀ emissions limits listed in the appendix of this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.6, and the following requirements:

- The line 4 fryer shall be operated at normal production rates during the performance tests
- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157
- The pressure drop across the scrubber controlling emissions from the line 4 fryer shall be recorded during each performance test run
- The throughput of finished potato product from the line 4 fryer, expressed as tons-per-hour, shall be recorded during each performance test run

3.9 VOC Performance Tests

The permittee shall conduct a performance test to measure VOC emissions from the line 4 fryer stack on or before December 21, 2004, and at least once every five years thereafter. The permittee shall use the results of the VOC performance tests to establish a VOC emission factor which shall be used to estimate emissions from each fryer at the facility and to demonstrate compliance with the VOC emissions limits listed in the appendix of this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.6, and the following requirements:

- The line 4 fryer shall be operated at normal production rates during the performance tests

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- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157
- The throughput of finished potato product from the line 4 fryer, expressed as tons-per-hour, shall be recorded during each performance test run

3.10 Throughput Monitoring

The permittee shall monitor and record daily and annually, the throughput of finished potato product from the line 1 fryer, line 2 fryer, line 4 fryer, and the special products fryer to demonstrate compliance with Permit Condition 3.3. Throughput shall be recorded as tons-per-day and tons-per-year. The throughputs for each day may be determined using monthly throughput records. All throughput records shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

3.11 Air Pollution Control Equipment

The following parameters shall be monitored and recorded during operation as specified below. The records shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

- The pressure drop across the scrubber once per day
- The scrubbing media flowrate to the scrubber once per day
- Maintenance of the scrubber and any modifications made that effect the operating specifications of the scrubber as performed

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4. LINE 1 DRYER, LINE 2 DRYER, LINE FOUR DRYER AND SPECIAL PRODUCTS DRYER**4.1 Process Description**

Potatoes are cut, defects are removed, the cut potatoes are graded and then blanched. Blanching is a hot water process which partially cooks the potatoes. Only steam is emitted from the blanchers. The potatoes are dried in one of four natural gas-fired dryers. Emissions from the dryers are uncontrolled. The emissions are steam, PM, and combustion by-products.

Emissions Limits**4.2 Emissions Limits**

Emissions from the line 1 dryer, line 2 dryer, line 4 dryer, and the special products dryer shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**4.3 Throughput Limit**

The maximum throughput of finished potato product from the line 1 dryer, line 2 dryer, line 4 dryer, and the special products dryer shall not exceed the tons-per-day and tons-per-year production limits listed in Table 4.1. To demonstrate compliance with the annual production limit, the monthly production from each dryer shall be summed over the previous 12-month period.

Table 4.1 DAILY AND ANNUAL DRYER PRODUCTION LIMITS

Source Description	Daily Production Limit (T/Day)	Annual Production Limit (T/Any Consecutive 12-Month Period)
Line 1 dryer	590	215,146
Line 2 dryer	544	198,502
Line 4 dryer	770	281,021
Special products dryer	109	39,683

4.4 Fuel Specification

The line 1 dryer, line 2 pre-dryer, line 2 dryer, line 4 dryer, and the special products dryer shall burn natural gas exclusively.

Monitoring And Recordkeeping Requirements**4.5 PM₁₀ Performance Tests**

The permittee shall conduct a performance test to measure PM₁₀ emissions from the line 4 dryer stack on or before December 21, 2004, and at least once every five years thereafter. The permittee shall use one stack of the line 4 dryer stacks that represents the worst-case PM₁₀ emissions for testing purposes.

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The permittee shall use the results of the PM₁₀ performance tests from the line 4 dryer to establish a PM₁₀ emission factor which shall be used to estimate emissions from each dryer at the facility and to demonstrate compliance with the PM₁₀ emissions limits listed in the appendix of this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.6, and the following requirements:

- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157
- The throughput of finished potato product from the line 4 dryer, expressed as tons-per-hour, shall be recorded during each performance test run
- The line 4 dryer shall be operated at normal production rates during the performance tests

4.6 Throughput Monitoring

The permittee shall monitor and record daily and annually, the throughput of finished potato product from the line 1 dryer, line 2 dryer and pre-dryer, line 4 dryer, and the special products dryer to demonstrate compliance with Permit Condition 4.3. Throughput shall be recorded as tons-per-day and tons-per-year. The throughputs for each day may be determined using monthly throughput records. All throughput records shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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5. BOILER NO. 1 (COMBUSTION ENGINEERING)**5.1 Process Description**

Boiler No. 1 provides process steam principally used for potato peeling, blanching, drying, and frying. Boiler No. 1 is a Combustion Engineering boiler, Model No. 26-A-15, with a heat input capacity rated at 180 MMBtu/hr. There are no emissions controls on the boiler.

Emissions Limits**5.2 Emissions Limits**

In accordance with IDAPA 58.01.01.676, PM emissions from Boiler No. 1 shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting natural gas, or 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting diesel fuel or cooking oil.

5.3 Emissions from Boiler No. 1 shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

5.4 In accordance with 40 CFR 60.44b, NO_x emissions from Boiler No. 1 shall be less than 0.2 lb/MMBtu (expressed as nitrogen dioxide) as measured by a CEMS.

5.5 The requirements of 40 CFR 60 Subparts A and Db shall not be in effect until the boiler is operated above 100 MMBtu/hr.

Operating Requirements**5.6 Fuel Specification**

Boiler No. 1 shall burn natural gas, diesel fuel with a maximum fuel sulfur content of 0.05%, or cooking oil exclusively.

Monitoring And Recordkeeping Requirements**5.7 Operation Parameters Monitors**

The permittee shall monitor and record the fuel type burned in Boiler No. 1. For each shipment of diesel fuel, the fuel sulfur content shall be certified to demonstrate compliance with Permit Condition 5.6. These records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

5.8 NO_x Monitoring

The permittee shall fully comply with all monitoring requirements established by 40 CFR 60 Subpart A – *General Provisions* and Subpart Db – *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* (40 CFR 60.40b). In particular, the permittee shall install, certify, operate, and maintain, in accordance with all the requirements of 40 CFR 60.48b, a NO_x CEMS with an

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automated data acquisition and handling system for measuring and recording NO_x concentration (in parts per million) and NO_x emission rate (in pounds per million British thermal units) from the boiler stack.

The permittee shall fully comply with all applicable record keeping requirements set forth in 40 CFR 60, Subpart Db. All such records shall be made available to DEQ representatives upon request.

Reporting Requirements**5.9 Test Protocols for NO_x CEMS Certification/Recertification Tests**

The permittee shall submit a test protocol for DEQ approval for each certification and recertification test of the NO_x CEMS required in Permit Condition 5.8. Each test protocol shall be submitted to the DEQ for approval at least 15 days prior to the respective test date.

5.10 Required NO_x CEMS Information

The permittee shall fully comply with the reporting requirements set forth in 40 CFR 60, Subpart Db. In accordance with 40 CFR 60.49b, copies of all certification or recertification notifications, certification or recertification applications, and monitoring plans shall be submitted to DEQ. Furthermore, the permittee shall submit to DEQ a written report (including all raw field data, etc.) for each certification or recertification test required by Permit Condition 5.7.

Each report shall be submitted to DEQ within 30 days of the date on which the respective test was completed.

5.11 Quality Assurance Procedures

The permittee shall follow quality assurance (QA) procedures in accordance with 40 CFR 60, Appendix F and submit the QA results to DEQ for approval within 30 days after the test date.

The permittee shall submit a written notification of the QA tests to DEQ within 30 days prior to performing each respective test.

5.12 Excess NO_x Emissions

The permittee shall submit to DEQ copies of all excess emissions and monitoring systems performance reports and/or summary reports for the NO_x CEMS. The reporting requirements and report format shall be the same as those specified in 40 CFR 60.7(b) through (d) and IDAPA 58.01.01.131. For NO_x emissions from the boiler stack, periods of excess emissions are any and all 24-hour rolling average NO_x concentrations as measured by the NO_x CEMS, which exceed the allowable NO_x concentration given in Permit Condition 5.3.

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6. BOILER NO. 2 (MURRAY TRANE) AND BOILER NO. 3 (CLEAVER-BROOKS)**6.1 Process Description**

Boiler No.'s 2 and 3 provide process steam principally used for potato peeling, blanching, drying, and frying. Boiler No. 2 is a Murray Trane boiler, Model No. MCF4-57, with a heat input capacity rated at 72 MMBtu/hr. Boiler No. 3 is a Cleaver Brooks boiler, Model No. D-52, with a heat input capacity rated at 36 MMBtu/hr. There are no emissions controls on either boiler.

Emissions Limits**6.2 Emissions Limits**

In accordance with IDAPA 58.01.01.676, PM emissions from Boiler No.'s 2 and 3 shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting natural gas, or 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting diesel fuel or cooking oil.

6.3 Emissions from Boiler No. 2 and Boiler No. 3 shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**6.4 Fuel Specification**

Boiler No. 2 and Boiler No. 3 shall burn natural gas, diesel fuel with a maximum fuel sulfur content of 0.05%, or cooking oil exclusively.

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7. HEATERS AND BURNERS***Emissions Limits*****7.1 Emissions Limits**

In accordance with IDAPA 58.01.01.676, PM emissions from the heaters and burners shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting natural gas.

- 7.2 Emissions from the heaters and burners shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**7.3 Fuel Specification**

The heaters and burners shall burn natural gas exclusively.

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8. EMERGENCY DIESEL GENERATORS (100 KW AND 230 KW)***Emissions Limits*****8.1 Emissions Limits**

In accordance with IDAPA 58.01.01.676, PM emissions from the emergency generators shall not exceed 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting diesel fuel.

- 8.2 Emissions from the emergency generators shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**8.3 Hours of Operation**

- Each emergency generator shall not be operated for more than 8.5 hr/day, except during an emergency.
- Each emergency generator shall not be operated for more than 500 hours per any consecutive 12-month period.

8.4 Fuel Specification

The emergency generators shall be fired by No. 2 diesel fuel exclusively. The fuel sulfur content shall not exceed 0.5 percent by weight, as required by IDAPA 58.01.01.728.

8.5 Maintenance and Operating Requirements

The permittee shall maintain and operate the emergency generators in accordance with manufacturer recommendations.

Monitoring And Recordkeeping Requirements**8.6 Emergency Generator Operations**

The permittee shall monitor and record the date and the number of hours of operation for each emergency generator to demonstrate compliance with Permit Condition 8.3. These records shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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9. WASTE GAS HEATER***Emissions Limits*****9.1 Emissions Limits**

In accordance with IDAPA 58.01.01.676, PM emissions from the waste gas heater shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting natural gas or waste gas.

- 9.2 Emissions from the waste gas heater shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

Operating Requirements**9.3 Fuel Specification**

The waste gas heater shall burn waste gas or natural gas exclusively.

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10. APPENDIX

ConAgra Foods Packaged Foods Company, Inc., dba Lamb- Weston Inc. and ConAgra Foods Specialty Potato Products - Twin Falls

HOURLY (LB/HR¹) AND ANNUAL (T/YR²) EMISSION LIMITS³

Emission Unit	PM ₁₀ ⁴		SO ₂ ^{5,6}		VOC ⁶		NO _x ^{7,8}	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Line 1 fryer	2.36	10.33				3.31		
Line 2 fryer	2.18	9.53				3.05		
Line 4 fryer	3.08	13.49				4.32		
Special products fryer	0.44	1.93				0.61		
Line 1 dryer	1.38	6.05						3.25
Line 2 dryer and Pre-dryer	1.37	5.75						3.00
Line 4 dryer	1.80	7.90						4.59
Special products dryer	0.25	1.12						0.74
Boiler No. 1	3.02	11.39		35.15				99.00
Boiler No. 2	1.21	5.29		16.34				60.65
Boiler No. 3	0.60	2.65		8.17				30.32
Waste gas heater	0.16	0.74		89.97				9.72
Heaters and burners								3.75
Emergency diesel Generators	0.87	0.22						3.73
Total Facility				99.00				99.00

¹ Pounds per hour

² Tons per year

³ As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or the DEQ's emission estimation methods used in the permit application analysis.

⁴ Particulate matter with an aerodynamic diameter less than or equal to a nominal ten microns

⁵ Sulfur dioxide

⁶ Volatile organic compound

⁷ Nitrogen oxides

⁸ Sulfur dioxide (SO₂) emissions from the waste gas heater shall not exceed 89.96 T/yr. To maintain synthetic minor status the combined SO₂ emissions from the waste gas heater and the rest of the facility shall not exceed 99.00 T/yr.

⁹ To maintain synthetic minor status the combined NO_x emissions from boiler No. 1 and the rest of the facility shall not exceed 99 T/yr.

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11. TIER II PERMIT GENERAL PROVISIONS

- 11.1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- 11.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 11.3 The permittee shall allow the director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emissions testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the director.
- 11.4 Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 11.5 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the director's request shall cause the permit to be voided.
- 11.6 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

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Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

- 11.7 The provisions of this permit are severable; if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.